

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Rev. Jan. 2012

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DAIL MOSES-TAYLOR

Plaintiff(s),

**CIVIL CASE DISCOVERY PLAN
AND SCHEDULING ORDER**

- against -

GREYSTON FOUNDATION, INC.

Defendant(s).

7:21 CV 06756 (NSR)

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This Civil Case Discovery Plan and Scheduling Order is adopted, after consultation with counsel, pursuant to Fed. R. Civ. P. 16 and 26(f):

1. All parties do not consent to conducting all further proceedings before a Magistrate Judge, including motions and trial, pursuant to 28 U.S.C. § 636(c). The parties are free to withhold consent without adverse substantive consequences. (If all parties consent, the remaining paragraphs of this form need not be completed.)
2. This case is to be tried to a jury.
3. Joinder of additional parties must be accomplished by April 1, 2022.
4. Amended pleadings may be filed until n/a.
5. Interrogatories shall be served no later than April 15, 2022, and responses thereto shall be served within thirty (30) days thereafter. The provisions of Local Civil Rule 33.3 shall apply to this case.
6. First request for production of documents, if any, shall be served no later than April 15, 2022.
7. Non-expert depositions shall be completed by September 30, 2022.
 - a. Unless counsel agree otherwise or the Court so orders, depositions shall not be held until all parties have responded to any first requests for production of documents.
 - b. Depositions shall proceed concurrently.
 - c. Whenever possible, unless counsel agree otherwise or the Court so orders,

non-party depositions shall follow party depositions.

8. Any further interrogatories, including expert interrogatories (n/a), shall be served no later than August 19, 2022.
9. Requests to Admit, if any, shall be served no later than October 31, 2022.
10. Expert reports shall be served no later than n/a. The parties do not currently anticipate use of experts in this matter. If that changes, the parties will timely notify the Court of same and submit a proposed schedule.
11. Rebuttal expert reports shall be served no later than n/a.
12. Expert depositions shall be completed by n/a.
13. Additional provisions agreed upon by counsel are attached hereto and made a part hereof.
14. **ALL DISCOVERY SHALL BE COMPLETED BY September 30, 2022**.
15. Any motions shall be filed in accordance with the Court's Individual Practices.
16. This Civil Case Discovery Plan and Scheduling Order may not be changed without leave of Court (or the assigned Magistrate Judge acting under a specific order of reference).
17. The Magistrate Judge assigned to this case is the Hon. Judith C. McCarthy.
18. If, after entry of this Order, the parties consent to trial before a Magistrate Judge, the Magistrate Judge will schedule a date certain for trial and will, if necessary, amend this Order consistent therewith.
19. The next case management conference is scheduled for _____, at _____. (The Court will set this date at the initial conference.)

SO ORDERED.

Dated: White Plains, New York

Nelson S. Román, U.S. District Judge

Addendum Per Civil Case Discovery Plan and Scheduling Order, No. 13

The parties agree to the following deadlines:

1. Plaintiff will produce an ESI proposal no later than April 15, 2022.
2. The parties will agree to an ESI protocol no later than May 1, 2022.
3. Substantial completion of document discovery, including ESI: August 12, 2022.